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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KWONG YUNG,)	No. 07-CV-5949
)	
Plaintiff,)	PLAINTIFF'S MEMORANDUM OF
vs.)	POINTS AND AUTHORITIES IN
)	OPPOSITION TO DEFENDANT'S
INSTITUTIONAL TRADING)	MOTION TO DISMISS FOR LACK
COMPANY, a corporation,)	OF PERSONAL JURISDICTION
IT. COM, a corporation, DOES 1 to 10,)	<hr/>
)	Date: February 22, 2008
)	Time: 10:00 a.m.
Defendants.)	Courtroom: 1, 17 th Floor
<hr/>)	Judge: Hon. Samuel Conti

KWONG YUNG, the Plaintiff herein, hereby respectfully submits
his Memorandum of Points and Authorities in Opposition to the Motion of Defendant to
Dismiss his Action for Lack of Personal Jurisdiction, as follows:

I. MINIMUM CONTACTS TEST

In his Opposition Declaration, Plaintiff has indicated a number of
substantial contacts with California customers which he made on behalf of Defendants.

Under the "economic reality test," the fact that Defendants solicit
business in California, is sufficient to establish personal jurisdiction in this forum. *Tuazon v. R.*

J. Reynolds Tobacco Co., 433 F.3d 1163 (9th Cir. 2006).

The issue is one of fact, i.e., to determine the percentage of business done in this District by Defendant companies who may not be residents themselves.

Amoco v. Egypt Oil Co. v. Leonis Navigation Co., Inc., 1 F.3d 848 (9th Cir. 1993).

Plaintiff's declaration makes at least a prima facie showing sufficient to defeat Defendant's motion.

II. CONCLUSION

Defendant corporations do a sufficient amount of business in the Northern District of California to render them amenable to personal jurisdiction.

Accordingly, the instant motion should be denied.

Respectfully submitted,

Dated: February 1, 2008.

/s/

ALBERT L. BOASBERG,
Attorney for Plaintiff